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**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN MARIANA ISLANDS**

Imperial Pacific International (CNMI) LLC,

Plaintiff,

vs.

Commonwealth of the Northern Mariana
 Islands, Commonwealth Casino
 Commission, Arnold Palacios, governor of
 CNMI, in his official capacities; Edward C.
 Deleon Guerrero, Chairman of CCC, in his
 official and personal capacities; Rafael S.
 Demapan, Vice Chairman of CCC, in his
 official and personal capacities; Mariano
 Taitano, Commissioner of CCC, in his
 official and personal capacities; Martin
 Mendiola, Commissioner of CCC, in his
 official and personal capacities; Ramon M.
 Dela Cruz, Commissioner of CCC, in his
 official and personal capacities;

Defendants.

CASE NO. 24-CV-00001

**PLAINTIFF'S MOTION TO EXTEND
 TIME UNDER LOCAL RULE 7.1(f)
 TO RESPOND TO MOTIONS TO
 DISMISS**

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1 In the above-captioned case, Plaintiff Imperial Pacific International (CNMI) LLC, (“IPI”)
2 filed a First Amended Complaint (FAC) on April 8, 2024 (ECF No. 38).

3 On April 19, 2024, Plaintiff IPI filed a voluntary petition under Chapter 11 of Title 11 of
4 United States Code. (24-BK-00002) with the Bankruptcy Court for the Northern Mariana
5 Islands.

6 On April 25, 2024, Defendant Arnold Palacios in his Official Capacity filed a Motion to
7 Dismiss to the FAC. (ECF No. 39).

8 On April 25, 2024, Defendant Commonwealth of the Northern Mariana Islands (CNMI)
9 filed a Motion to Dismiss to the FAC. (ECF No. 40).

10 On April 25, 2024, Defendant Andrew Yeom filed a Motion to Dismiss to the FAC. (ECF
11 No. 41).

12 On April 25, 2024, Defendants Commonwealth Casino Commission, Edward C. Deleon
13 Guerrero, Rafael S. Demapan, Mariano Taitano, Martin Mendiola, and Ramon M. Dela Cruz, in
14 their official and personal capacities, filed a Motion to Dismiss to the FAC. (ECF No. 42).

15 On April 30, 2024, the terms of commissioners Ramon M. Dela Cruz of Tinian and
16 Martin Mendiola of Rota expired.

17 On May 4, 2024, Plaintiff and Defendant Andrew Yeom stipulated to dismiss Defendant
18 Andrew Yeom from the above captioned case with prejudice. (ECF No. 43). The stipulated
19 motion is currently pending before the Court.

20 Based upon what happened since the filing of the FAC, Plaintiff believes that it would be
21 prudent to amend the FAC.

22 Pursuant to Local Rule 7.1. c. 2, “[t]he opposing party must file an opposition (or
23 statement of non-opposition) to a motion no later than fourteen (14) days after the motion is
24 served. An opposition that is untimely filed may be disregarded by the Court and stricken from
25 the record. Failure to timely file an opposition may be deemed an admission that the motion is
26 meritorious.”

1 Pursuant to Local Rule 15.1. "A party who moves to amend a pleading must attach the
2 amendment to the motion. Any amendment to a pleading, whether filed as a matter of course or
3 upon a motion to amend, must, except by leave of court, reproduce the entire pleading as
4 amended, and may not incorporate any prior pleading by reference. A failure to comply with this
5 rule is not grounds for denial of the motion but may be grounds for imposition of sanctions."

6 To amend the FAC, leave of the Court is necessary. There is not enough time for Plaintiff
7 to comply with Local Rule 15.1 before the deadline to respond to the four Motions to Dismiss
8 filed by Defendants, which are due by May 10th, 2024.

9 Plaintiff met and conferred with the opposing counsels, counsels for CNMI and Governor
10 Palacios opposed the extension request. counsel for CCC and the commissioners did not respond.
11 After the meet-and-confer process to resolve the dispute, Plaintiff was unable to resolve the
12 matter without court action. There are no other known affected people or entities that were not
13 notified of the motion by the filing of this Motion via the court's ECF system. There is no
14 hearing scheduled for the Motions to Dismiss.

15 This is the first time Plaintiff requested an extension of time. Previously, Defendants and
16 Plaintiff stipulated to extend the time for Defendants to respond to the Complaint till April 25,
17 2024, which was granted by the Court. (ECF No. 18).

18 Plaintiff hereby moves the court to grant two weeks extension for Plaintiff to comply
19 with Local Rule 15.1 to file and serve the Motion for Leave to File the Second Amended
20 Complaint (SAC) no later than May 18, 2024, Chst; and additional reasonable time to respond to
21 the Motions to Dismiss should the proposed Motion for Leave to File the SAC were denied.

22
23 A proposed order is attached.

24
25 Dated: May 4th, 2024
26 Saipan, CNMI

25 Respectfully submitted,
26 By: /s/ Stephen Nutting
27 Stephen Nutting
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12 (CNMI), LLC
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